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Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL THEIR  
DISCOVERY LETTER BRIEF**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal their Discovery Letter Brief (“Letter”). Specifically, Defendants file under seal the following confidential document in accordance with Paragraph 14.4 of the Protective Order:

Document	Portions to Be Filed Under Seal	Designating Party
Discovery Letter Brief (“Letter”)	Highlighted Portions	Plaintiff (Green)

The green-highlighted portions of the Letter contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). (Yang Decl. ¶ 3.)

Defendants do not believe the green-highlighted portions of the Letter merit sealing, but Waymo designated this material “Highly Confidential – Attorneys’ Eyes Only.” Defendants file this material under seal in order to provide Waymo the opportunity to justify sealing pursuant to Local Rule 79-5. (Yang Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the document at issue, with accompanying chamber copy.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on December 20, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and designate the service copies of these documents as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

1 Dated: December 20, 2017

MORRISON & FOERSTER LLP

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3 By: /s/ Arturo J. Gonzalez  
ARTURO J. GONZALEZ

4 Attorneys for Defendants  
5 UBER TECHNOLOGIES, INC. and  
6 OTTOMOTTO LLC  
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